



**TELECOMMUNICATIONS
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April 22, 1996

Mr. William F. Caton
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

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Dear Mr. Caton,

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I am writing concerning the FCC's proposal to eliminate tariff filing requirements for interexchange carriers as stated in CC Docket No. 96-61. I would like to express my opposition to this proposal.

Telecommunications Information Services, Inc. is a tariff advisory service providing interested parties with copies of both state and federal tariffs. While I understand that our business may make us appear somewhat prejudiced in this matter, we do represent hundreds of clients who would be harmed by your proposal. Our clients include, SMDR/Call Accounting vendors, software vendors, equipment manufacturers, consultants, small resellers, payphone owners, attorneys, and consumer agencies. All of these individuals have a need for tariff information.

For example, call accounting vendors and private payphone operators need rating information to program their systems. While I understand that the FCC does not regulate rates charged for interstate calls from payphones or the hotel/motel industry, many of these companies base charges on the interstate rates of one of the major carriers. Considering the past (and still current) rate abuses by some companies in these markets, I think it would be in the best interest of consumers to allow those companies trying to price fairly the ability to keep track of prevailing rates. Consultants and utility auditing practices are entirely dependent on tariff information. Having an unbiased source of service and rate information is what enables them to make decisions on services for clients and recover monies billed in error for clients. Not only would these businesses be hurt by mandatory detariffing but so would the clients they serve. Telecommunications resellers (mainly small businesses) do track rates of their competitors as you assert. This is primarily so because they must sell/compete based on price. They do not have the advertising budgets, name recognition, or administrative staffs of the major carriers. Their pricing however, does help force the major carriers rates down and thereby benefits consumers.

In more than one paragraph the commission sights the example of tariff forbearance for commercial mobile radio service with regard to rates. The reality is that the elimination of tariffs has had little or no effect on pricing. Carriers still track competitors rates and price

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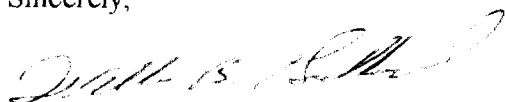
at similar levels. In paragraph III.B.1.31. the commission states that forbearance will reduce administrative costs on carriers making new offerings. If anything administrative savings from the elimination of tariffs will be more than offset by the money spent by carriers trying to track new services and rates of competitors. Doing away with tariffs will not stop companies from attempting to track competitors information. In response the commissions' assertion in paragraph III.A.29. that tariff filing stifles price competition and service and marketing innovations, I would point to the number of promotional offering filed by the carriers in the last year. In the past year or longer, more promotions have been filed than most individuals or businesses can keep up with.

Paragraph III.A.17. of CC Docket 96-61 sets forth three conditions for forbearance of regulations under the 1996 Act. In regard to the first two conditions, "That tariff filing is not necessary to ensure that non-dominant interexchange carriers' charges, practices, or classifications are just and reasonable" and "That tariff filing is not necessary for the protection of consumers", my response would be that without tariffs how will individuals know if they are being treated in a just and reasonable manner. While the FCC may retain the right to request pricing information from carriers in regard to complaints, true oversight would be limited to only those parties who have made enough of an effort to initiate an FCC action. Keeping tariff information available to the public would empower small businesses and individuals to be able to help monitor and police carriers. With respect to the third condition "That forbearing from enforcing tariffing requirements with respect to non-dominant interexchange carriers is consistent with the public interest", I would assert that public interest is better served by having an unbiased source for this information available to them. Many communications industry related businesses rely on the tariff information for their products and services and it would not be in their interest to eliminate interexchange carrier tariffs. Also, it is in the public interest for individuals to have this information available in their dealings with carriers rather than relying on the carriers biased information.

From my point of view, the greatest benefit from detariffing will be realized by the largest carriers, with the commission benefiting from reduced administration and expenses. Detariffing will prove to be to the detriment of many small telecommunications companies and the consumer.

In closing, I would once again urge the commission to maintain interexchange tariff requirements for the protection of small businesses and consumers and for the general public interest.

Sincerely,

A handwritten signature in dark ink, appearing to read "William B. Goddard", written in a cursive style.

William B. Goddard
President